Case 08-35653-KRH Doc 8557 Filed 09/14/10 Entered 09/14/10 10:23:49 Desc Main Document Page 1 of 4

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Counsel for Crown CCI, LLC

## UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF VIRGINIA RICHMOND DIVISION

IN RE:	CIRCUIT CITY STORES, INC., et al.	)
		) Case No. 08-35653-KRH
	Debtors.	) Jointly Administered
		) Chapter 11 Proceedings

## **OBJECTION TO TRANSFER OF CLAIM**

Comes now Crown CCI, LLC ("Crown"), an unsecured creditor herein and for its Objection to the transfer of claim number 13467 states as follows:

- 1. That Crown CCI, LLC is a general unsecured creditor in the Circuit City case, having a claim resulting as of its status as a Landlord of a Circuit City location.
- 2. Crown CCI, LLC filed an unsecured Proof of Claim designated as Claim Number 13467 in the amount of \$68,381.33 herein.
- 3. On August 26, 2010 WBCMT 2005-C21South Ocean Gate Avenue Limited Partnership filed a Notice that it had acquired the above-referenced claim from Crown CCI, LLC.
- 4. By Notice dated September 2, 2010, Notice was mailed to counsel for Crown CCI, LLC advising counsel for Crown CCI the transfer of this claim. The Notice further provided that if the transferor objected to the transfer of the claim that an Objection must be filed within twenty-one (21) days of the date of the Notice.

Case 08-35653-KRH Doc 8557 Filed 09/14/10 Entered 09/14/10 10:23:49 Desc Main Document Page 2 of 4

5. Crown CCI, LLC objects to the transfer of this claim. Crown CCI has no record that it transferred this claim to WBCMT 2005-C21South Ocean Gate Avenue Limited Partnership, and therefore objects to the transfer of the claim.

WHEREFORE, Crown CCI, LLC objects to the transfer of Claim Number 13467 in the amount of \$68,381.33 to WBCMT 2005-C21South Ocean Gate Avenue Limited Partnership, and that it may have such other and further relief as may be appropriate under the circumstances.

Dated: September 14, 2010

CROWN CCI, LLC

By /s/ Paul S. Bliley, Jr.
Of Counsel

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## **CERTIFICATE OF SERVICE**

I hereby certify that on this 14th day of September, 2010, a true and accurate copy of the foregoing was electronically filed with the Clerk of the Bankruptcy Court for the Eastern District of Virginia, Richmond Division, using the CM/ECF system, which thereby caused the above to be served electronically on all registered users of the ECF system that have filed notices of

appearance in this matter, and was mailed, by U.S. Mail, first class, postage prepaid, to all persons on the attached Service List.

## SERVICE LIST

WBCMT 2005-C21 South Ocean Gate Avenue Limited Partnership c/o Mindy A. Mora
Bilzin Sumberg Baena Price & Axelrod LLP
200 S Biscayne Blvd. Suite 2500
Miami, FL 33131

Douglas M. Foley, Esquire McGuireWoods LLP 9000 World Trade Center 101 W. Main Street Norfolk, VA 23510

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Counsel to Prepetition Lenders/Counsel to Postpetition Lenders

/s/ Paul S. Bliley, Jr.
Paul S. Bliley, Jr.

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